

TO: The ECFS Federal Communications Commission Section
Comments to Up-date & Correct.

From: Dale E. Reich - K8AD
Seville, Ohio 44273

RE: Comments Filed so far in this RM event.

In review of the ARRL web page make's a error in posting on November 24 New In Breif. They refer to this filling as a "Automatic" upgrade and that is not so. The upgrade is "Application" up grade and all may not wish to up-grade that is why a "application precess" through a VEC or a VE org is requestd.

The filtering of applications through a VEC or VE org would require proof of licensing and I would hope operation to support the application process. The final approval would be on the hands of the FCC to do as they hold a number of records that are not in public view on computers, and still in file boxes. There Could be pending enforcment in processes for a upgrade application.

Before the past change of rule's in the "Ham" radio sections the "Advanced" class only had to pass a 20 WPM exam for a upgrade to extra. The FCC stated in the past rulling that the "Advanced" could more or less due the VE's duties that they were not allowed to do in the past.

The error is that there are a lot of "Extra" class licenses with only 5 WPM today, and the "Advanced" had the 13 WPM test witch is to a point un-fair. Past [Long Time] "Advanced" class were required to take the mutch harder exam's that required true radio engineering questions, with out a "Pool Question" base known to the general public.

The current "Extra" that only read the very breif and edited version on the ARRL web page and made some "absurb" or "minor absurb" somments, about Testing for up-grade of the Advanced relating to current exam's program are in of the past way from the late 1950's to 1970's, and the Mid 1970's to late 1988. The FCC forms of testing, and the later VEC program has made lots of changes back and forth over the period.

This request for a rule making to correct some minor adjustments only fair to the some +86,000 or so "Advanced" class "Ham's"! The FCC had a good idea to reduce the so called "Class" warfair between the past (7) classes. I reviewd the remarks of Mr. Randy Perkins and his Idea looks a lot better than the one I submitted.

For another point of view, my "RM" Request stated that a lot of input from the radio community was need of sorts. I don't expect my view to fixed in stone or steel of sorts!

In the "RM" it also make lite of changes for the few that Novices that don't up-grade so that they can be of Public Service.

The changes to remmove the Novice's from the popular VHF bands in voice that took place from the 1970's through the 1988 era were

caused by a number of factors. The Citizen Band & Hobby'est of that era were pushing for a "No-Code" communicators license. The ham community fearing losing 2 meters to the "Future Hobby Class" went through a series of formal changes to prevent the FCC from taking away 2 meters and 6 meters away from "Hams" and giving part of it to the "CB'ers or Hobby'ist"! They took the limited voice away from the then Novices, and gave them 2 un-popular bands to work voice. They took the 145 to 147 for Re-peater use. Most of the Novices were using "AM" in that band at that time. This was a form of "class warfair", and there was nothing "fair" about it!

For the request for expansion of the current "Novice Sub Band at 10 meters, with all Mode only is fair for the operators who have been limited to USB and CW. 10 meter's makes a great local band most of the time at late night. When the band is up however the small slot of "CW" becomes packed, the "Novice Voice" sub band looks worse than the "Citizen Band" with QRM. Contest days the 10 meter band is useless in the "Novice CW & Voice" subbands! I also note that the un-used sections of 10 meters are starting to fill up with the "Export CB Radio" operators. Don't use it the "Export CB Radio" operators will take it! Some 60 miles away a Network of "Export CB Operators" are camped out in the 10 meter band, and hold a Sunday morning NET with their CB aka's! The FCC was alerted, but it takes time for the government to act. There is a true need to use the balance of 10 meter frequencies. The request for "All Mode" for the Novices is only good thinking who know what future mode may be workable in a few years. restricting the novices to "CW & USB" in a limited current space making more QRM and rude operators in contests.

Digital and CW communications may be the same to some people, however in other parts of the world other modes of communication becoming the common. Holding the Novices to USB & CW / Digital of sorts is not best interest of multi-mode equipment.

In my request for "RM" I stated input from the radio community of sorts was needed! From Review of the submitted "No" type of Comments not one has made a serious input to the Positive changes to make it a better "RM"! From a point of view the "No" comments look like an issue of a "Frequency Sub Band Turf War"! They have not provided any input that would make adjustments upscale or down scale to make it work.

Good Idea input, not unsupported fact of error!

On a personal note if you catch any miss-spelling in the text the spell checker is not working from this terminal.

With Respect,

Dale E. Reich